

I am writing in regard to the new regulations governing unsolicited fax advertisements, which are scheduled to go into effect on August 25. I urge the FCC to more carefully consider the impact of these regulations on non-for-profit associations. Those of us who work in association management recognize that removing the "established business relationship" qualification from the fax regulations will force associations to obtain the written consent of our own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature. This regulation would be an obstacle to managing the affairs of our associations, forcing associations to take on the costly and time-consuming task of collecting permissions. This would be especially daunting for those associations with thousands of members. Also, there are other undefined issues about the new regulations, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether, for instance, a written consent form would expire with membership.

If the original intent of this regulation was to quell the flow on unwanted commercial faxes, I can appreciate that motive. However, if the resulting implementation inhibits the communications of organizations dedicated to disseminating worthwhile information to willing recipients, then this regulation is a disservice and potentially harmful to a free and open society.